

STATE OF OHIO

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AFFIDAVIT

COUNTY OF LAKE

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This day, to-wit: June 2, 2014, came Detective Donald Seamon of the Lake County Sheriff's Office, and after being duly sworn according to law, states the following:

1. Affiant has been assigned as an investigator with the Federal Bureau of Investigation Child Exploitation Task Force, and has been a certified peace officer in the State of Ohio for over fourteen (14) years;
2. Affiant is currently employed as a Deputy Sheriff with the Lake County Sheriff's Office. I have been employed as a Deputy for the past 14 years, the last six of which I have been a Detective;
3. Affiant has training and experience in investigations in misdemeanor and felony crimes in the State of Ohio;
4. Affiant has been assigned as an investigator with the Federal Bureau of Investigation Child Exploitation Task Force and has received specialized training in online Peer to Peer (P2P) investigations;
5. Between 02-25-2014 and 05-05-2014, I was conducting online P2P Investigations on the Gnutella 2 network;
6. Gnutella 2 is a P2P file sharing network used to exchange files between computers. The Gnutella 2 network, like other P2P file sharing networks, uses file hashing to uniquely identify files on the network and users typically locate files with keyword searches;



7. Files shared on the Gnutella 2 network use SHA1 hash values;
8. I was able to identify IP address 99.105.84.152 as sharing 361 Child Notable / 48 Child Erotic / 11 Child Other / 245 Unknown Content files over the Gnutella 2 network;
9. On 05-05-2014, I queried IP address 99.105.84.152 and downloaded a total of 4 complete files and 3 incomplete files all which were single source downloads from IP address 99.105.84.152. All times are Eastern Daylight Savings;
10. I personally previewed the following files:

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| + blonde 11 12yo totally covered in cum - pictures from ranchi torpedo dloaded in 2009- pedo kdv kidzilla ptch toddlers 0yo 1yo 2yo 3yo 4yo 5yo 6yo 9yo (1.jpg | MZDM5DHA32D6TPLZF4GF7AQMXY7EDOG | Is a photo of what appears to be of a naked 11 year old pre-pubescent female sitting in a chair with her legs spread. There is a white box covering part of her face. The female has a substance on her chest, stomach, and down towards her vagina. |
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| Nat&Ser 0054.JPG | HI62XFNTOT57TW322ODWFWOA70OOD7DK | Is a photo of a naked prepubescent male and female (approximately 11 years of age) lying on a bed. Both have their legs spread apart. The female is touching her vagina and the male is touching his penis. |
| Nat&Ser 0061.JPG | ZOMJK7NOHQLDWSRMRHWNMQVREBWUOU6 | Is a photo of a naked prepubescent male and naked pre-pubescent female (approximately 11 years of age) on a bed. The female is on her hands and knees. The male is also on his hands and knees behind and on top of the female in a sexual pose. It is unknown whether the female is being penetrated or not. |

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| Nat&Ser 0070.JPG | 7DKA5E4BTYRTMUXW7KDVLMOXJE2GNHV | is a photo of a naked pre-pubescent male and naked pre-pubescent female on a bed. The female is lying on her back with her hands on her breasts and her legs spread apart. The male is on top of the female between her legs and appears to be penetrating her. |
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11. On 05-17-2014 a check of IP address 99.105.84.152 was conducted through the American Registry for Internet Numbers (ARIN). The information received indicated that IP address 99.105.84.152 is registered to AT&T Internet Services;
12. On 05-17-2014 an Administrative Subpoena was requested on AT&T Internet Services, requesting the subscriber information for IP address 99.105.84.152 on 05-05-2014 10:36:29pm (EST);
13. On 05-28-2014 AT&T Internet Services, provided the following results:

John Clements,


1 -- Activate Date: 05-16-2011 -- Status: Open -- Member ID
 Johnnysee@att.net;

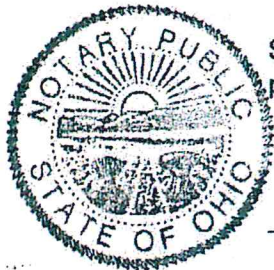
14. Through OHLEG we were able to confirm that a male named John Clements: SSN _____ is listed at the residence _____
15. Affiant further swears and affirms that I am aware that seizing stored communications implicated privacy rights which Congress believed important enough to protect under the Electronic Communication Privacy Act (ECMA), specifically 18 U.S.C. 2703. Such material is further protected by Ohio Revised Code 2933.51 et. seq. In executing the warrant requested, it is possible that I will seize such communications, along with other material encompassed in the warrant;
16. I am also aware that seizing arguable work product and/or documentary materials from someone who may be publishing/holding said materials for publication implicates privacy rights which Congress believed important enough to protect under the Privacy Protection Act, 42 U.S.C. 2000aa (P.A.). However, I believe that any material I seized will not fall with the P.P.A.;
17. Search authorization and seizure is sought, to-wit: Computer evidence related to Possession, distribution and production of Child Pornography and criminal activity including: **Stored electronic communication files, temporary files and / or saved files on the computers central processing unit, external and internal drives, external storage equipment or media and any and all computer or data processing software, or data including but not limited to hard disks, floppy disks, magnetic tapes, integral RAM or ROM units, and any other permanent or transient storage devices. Any and all permanent or transient storage devices. The following records of documents contained on paper in handwritten, typed, photocopied, or printed form stored on any other type of media, including but not limited to service billing records, computer electronic and voice mail system information, access**

numbers, passwords, personal identification numbers (PINS), telephone and address directories, logs, notes, memoranda, and correspondence relating to the operation of the electronic equipment, or other media, or software listed herein. Any information reflecting the use of credit card or credit services to obtain property, goods or services and any and all other fruits and instrumentalities of the following Illegal Possession of Child Pornography


18. In Affiant's training and experience, those in possession of child pornography rarely discard the images and remain in possession of them for extended periods of time.
19. The above information has led Affiant to believe that probable cause exists to believe that the items listed above are evidence of there now being unlawfully kept, concealed and possessed in the said residence,
The residence is further described as follows: a single family ranch style residence with white siding. The residence is on the West side of the street and faces East. There is a detached garage behind the residence. The numbers are clearly visible on the right side of the front door, contrary to and in violation of Ohio law, to wit: ORC Chapter 2907.321, 2907.322, and 2907.323.

AFFIANT FURTHER SAYETH NAUGHT.


AFFIANT



Sworn to and subscribed in my presence, this 2nd day of June, 2014.


JUDGE
Vincent Culotta